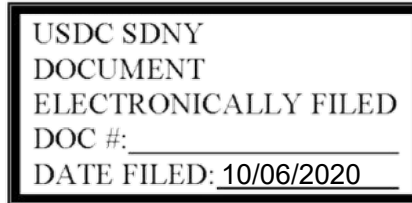




20-cv-6285



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October 6, 2020

VIA ECF

The Honorable John Peter Cronan
United States District Court for the Southern District of New York
500 Pearly Street
New York, New York 10007

Re: Stalling v. Motivate LLC et al (S.D.N.Y.) / Stipulated Extension Request

Dear Judge Cronan:

This Firm represents defendants Motivate LLC, Matthew Parker, Christopher Russell and Justin Lottie ("Defendants") in the above-referenced action. Consistent with Your Honor's Individual Practices, we write to respectfully request a 30-day extension of time for Defendants to respond to the Complaint of Plaintiff Deion Stalling ("Plaintiff"), to and including November 12, 2020. We make this request with the consent of Plaintiff's counsel.

Defendants' responsive pleading is presently due on October 13, 2020. This brief extension of time, to and including November 12, 2020, is needed so that counsel can investigate the allegations in the Complaint and so that the parties are able to continue to engage in good faith settlement negotiations in an attempt to reach a non-litigated resolution.

This is Defendants' first request for an extension of time and does not affect any other scheduled dates. This request is made in good faith and not for the purpose of causing undue delay. We thank the Court for its consideration of this request.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Howard M. Wexler

Howard M. Wexler

Defendants' request is GRANTED. Defendants shall file an answer or otherwise respond to Plaintiff's complaint by November 12, 2020. The parties are also reminded that, pursuant to Local Civil Rule 11.1 and S.D.N.Y. ECF Rule 13.1, all letters filed with the Court must include the docket number.

SO ORDERED.

cc: All Counsel of Record (via ECF)

Date: October 6, 2020
New York, New York


JOHN P. CRONAN
United States District Judge